

### **Remarks**

Claims 1-32 are pending in this application. In the office action dated January 20, 2004 the Examiner rejected claims 8 and 19 under 37 C.F.R. §1.75(c) as being of improper dependent form for failing to further limit the subject matter of previous claim 1; claim 27 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter regarded as the invention; claims 1-5, 8-16, and 19-28 under 35 U.S.C. §103(a) as being unpatentable over "Admitted prior art" and U.S. Patent No. 6, 069, 890 to White et al. (hereinafter White); and claims 6, 7, 17, 18, 29, and 30 under 35 U.S.C. §103(a) as being unpatentable over "prior art," and White in view of U.S. Patent No. 6, 532, 235 to Benson et al. (hereinafter Benson). In addition, the Examiner objected to the drawings under 37 C.F.R. § 1.83(a) based upon a feature specified in claim 4. With respect to the Examiner's objections and rejections, the Examiner is invited to consider the following remarks.

Claim 1 provides a communication system for linking one or more remote sites with one or more service sites via a communication network. Each remote site includes subscribers, a switch interconnecting the subscribers, one or more multi-line hunt groups connected to the switch, and a gateway interfacing each multi-line hunt group to the communication network. Furthermore, each service site includes a service platform for providing voice services, a switch, at least one multi-line hunt group connected to the switch, and a *gateway for interfacing each multi-line hunt group to the communication network*. The Examiner contends that claim 1 is unpatentable over "Admitted prior art, Figure 1, page 1, lines 6-17, page 4, lines 18-25, and page 5, lines 1-22 over White et al, US (6, 069, 890)."

According to M.P.E.P. § 2142, three criteria must be met for the Examiner to establish a *prima facie* case of obviousness. First, there must be some suggestion or motivation, either in White, or in knowledge generally available to one of ordinary skill in the art, to modify the background art. Second, there must be a reasonable expectation that this modification will succeed. Finally, either White, or the background art must teach or suggest all claim limitations.

As noted by the Examiner, neither the background art nor White disclose a gateway for interfacing a communication network with multi-line hunt groups. Furthermore, Applicants respectfully disagree with the Examiner's assertion that "it would have been obvious to a person of skill in the art at the time the invention was made to implement the gateway routers taught by White in the system of prior art so that internet telephony can be implemented." Applicants' Background Art section discusses the use of a multi-line hunt group to connect remote sites to service sites. White discloses the use of a gateway to connect a T1 / T3 trunk (117) to a T1 trunk (119). Neither White nor the background art teach or suggest an apparatus for interfacing a communication network to a multi-line hunt group. As such, a *prima facie* case of obviousness has not been established because the cited references fail to teach or suggest all claim limitations.

Second, there could be no reasonable expectation that insertion of the T1 to T1 / T3 gateway disclosed by White into the background art would successfully allow for the transfer of information between a communication network and a multi-line hunt group. This is evidenced from the fact that a multi-line hunt group need not utilize a T1 line. Furthermore, even if a particular multi-line hunt group utilized a T1 line, there is no indication that the simple T1 to T1 / T3 gateway disclosed by White would serve as an adequate interface when the T1 line is utilized in a multi-line hunt configuration. As such, a *prima facie* case of obviousness has not been established because there is no reasonable expectation that the modification proposed by the Examiner would succeed.

Last, there is no suggestion or motivation, either in White, or in knowledge generally available to one of ordinary skill in the art, to modify the background art as proposed by the Examiner. While hindsight often creates the illusion of obviousness, a review of White and of the background art fails to reveal any suggestion or motivation at the time of the invention to interface multi-line hunt groups to a communication network via a gateway apparatus.

Because claims 2-3, 5, and 9-14 depend from independent claim 1, which is asserted to be allowable, claims 2-3, 5, and 9-14 are also asserted to be allowable for at least the same reasons that the independent claim is allowable.

Claim 15 provides a communication system for transmitting audible messages over a communication network. The system includes subscribers, a switch and a gateway. The switch connects the subscribers and routes traffic outside of the subscriber locality over one or more multi-line hunt groups. Each multi-line hunt group includes multiple voice communication lines and at least one signaling line. The gateway converts the voice information received from the multi-line hunt groups into a format acceptable by the communication network. The gateway places the formatted information onto the communication network. The Examiner contends that claim 15 is unpatentable over "Admitted prior art, Figure 1, page 1, lines 6-17, page 4, lines 18-25, and page 5, lines 1-22 over White et al, US (6, 069, 890)."

As noted by the Examiner, neither the background art nor White disclose a gateway for converting and transferring signals from a multi-line hunt group onto a communication network. Furthermore, Applicants respectfully disagree with the Examiner's assertion that "it would have been obvious to a person of skill in the art at the time the invention was made to implement the gateway router of White with the feature of TCP/IP-PSTN conversions in prior art system so that PSTN services can be provided using the internet." The background art discloses the use of a multi-line hunt group to connect remote sites to service sites. White discloses the use of a gateway to connect a T1 / T3 trunk (117) to a T1 trunk (119). Neither White nor the background art teach or suggest an apparatus for interfacing a communication network to a multi-line hunt group nor for converting multi-line hunt group signals to a format acceptable by a communication network. As such, a *prima facie* case of obviousness has not been established because the cited references fail to teach or suggest all claim limitations.

Second, there could be no reasonable expectation that insertion of the T1 to T1 / T3 gateway disclosed by White into the background art would successfully allow for the transfer of information between a communication network and a multi-line hunt group. This is evidenced from the fact that a multi-line hunt group need not utilize a T1 line. Furthermore, even if a particular multi-line hunt group utilized a T1 line, there is no indication that the simple T1 to T1 / T3 gateway disclosed by White would serve as an adequate interface when the T1 line is utilized in a multi-line hunt configuration. As such, a *prima facie* case of obviousness has not been established because there is no reasonable expectation that the modification proposed by the Examiner would succeed.

Last, there is no suggestion or motivation, either in White, or in knowledge generally available to one of ordinary skill in the art, to modify the background art as proposed by the Examiner. While hindsight often creates the illusion of obviousness, a review of White and of the background art fails to reveal any suggestion or motivation at the time of the invention to interface multi-line hunt groups to a communication network via a gateway apparatus capable of converting voice and signaling data to a TCP/IP packet.

Because claims 16, and 20-22 depend from independent claim 15, which is asserted to be allowable, claims 16, and 20-22 are also asserted to be allowable for at least the same reasons that the independent claim is allowable.

Claim 23 provides a method of communicating over a communication network. After collecting information from subscribers, at least one voice communication line and one signal line on a multi-line hunt group are selected to receive the information. The information contained on the multi-hunt line group is subsequently formatted into a form compatible with the communication network. The formatted information is sent over the communication network. The Examiner contends that claim 23 is unpatentable over "Admitted prior art, Figure 1, page 1, lines 6-17, page 4, lines 18-25, and page 5, lines 1-22 over White et al, US (6, 069, 890)."

Neither White nor the background art teach or fairly suggest formatting information on voice communication lines and signaling lines of a multi-line hunt group into a format compatible with the communication network. As noted by the Examiner, neither the background art nor White disclose a gateway for formatting and transferring signals from a multi-line hunt group onto a communication network. Furthermore, Applicants respectfully disagree with the Examiner's assertion that "it would have been obvious to a person of skill in the art at the time the invention was made to implement the gateway router of White with the feature of TCP/IP-PSTN conversions in prior art system so that PSTN services can be provided using the internet." The background art discloses the use of a multi-line hunt group to connect remote sites to service sites. White discloses the use of a gateway to connect a T1 / T3 trunk (117) to a T1 trunk (119). Neither White nor the background art teach or suggest an apparatus for interfacing a communication network to a multi-line hunt group nor for formatting multi-line hunt group signals to be acceptable by a communication network. As such, a *prima facie* case of obviousness has not been established because the cited references fail to teach or suggest all claim limitations.

Second, there could be no reasonable expectation that insertion of the T1 to T1 / T3 gateway disclosed by White into the background art would successfully allow for the transfer of information between a communication network and a multi-line hunt group. This is evidenced from the fact that a multi-line hunt group need not utilize a T1 line. Furthermore, even if a particular multi-line hunt group utilized a T1 line, there is no indication that the simple T1 to T1 / T3 gateway disclosed by White would serve as an adequate interface when the T1 line is utilized in a multi-line hunt configuration. As such, a *prima facie* case of obviousness has not been established because there is no reasonable expectation that the modification proposed by the Examiner would succeed.

Last, there is no suggestion or motivation, either in White, or in knowledge generally available to one of ordinary skill in the art, to modify the background art as proposed by the Examiner. While hindsight often creates the illusion of obviousness, a review of White and of the background art fails to reveal any suggestion or motivation at the time of the

invention to interface multi-line hunt groups to a communication network via a gateway apparatus capable of formatting voice and signaling data to a TCP/IP packet.

Because claims 24-26, and 28 depend from independent claim 23, which is asserted to be allowable, claims 24-26 and 28 are also asserted to be allowable for at least the same reasons that the independent claim is allowable.

Claims 6, 7, 17, 18, 29 and 30 were rejected under § 103(a) as being “unpatentable over prior art as applied to claim 1, and further in view of Benson et al, US (6,532,235).”

Because claims 6 and 7 depend from independent claim 1, which is asserted to be allowable, claims 6 and 7 are also asserted to be allowable for at least the same reasons that the independent claim is allowable.

Because claims 17 and 18 depend from independent claim 15, which is asserted to be allowable, claims 17 and 18 are also asserted to be allowable for at least the same reasons that the independent claim is allowable.

Because claims 29 and 30 depend from independent claim 23, which is asserted to be allowable, claims 29 and 30 are also asserted to be allowable for at least the same reasons that the independent claim is allowable.

The Examiner references a typographical error on page 7, line 3. Applicants were unable to locate the referenced error at the cited location. After further review, Applicants believe the Examiner intended the citation to read page 7, line 17. As such, the specification was amended as denoted in the “Amendments to the Specification” section (above).

The Examiner referenced claim 4 as forming the basis for an objection to the drawings under 37 C.F.R. § 1.83(a). Claim 4 has been canceled.

Claims 8 and 19 were objected to under 37 C.F.R. § 1.75(c), "as being of improper dependent form for failing to further limit the subject matter of a previous claim 1." Claims 8 has been re-written in independent form as claim 31. Claims 19 has been re-written in independent form as claim 32.

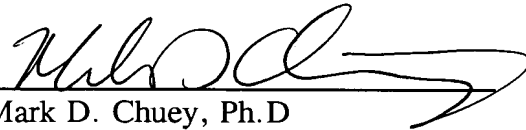
Claim 27 was rejected under 35 U.S.C. § 112, second paragraph, "as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention." Claim 27 has been canceled.

Consequently, in view of the above and in the absence of better art, Applicants respectfully submit that the application is in condition for allowance which allowance is respectfully requested. A check for \$172 is enclosed to cover the cost of the two additional independent claims. Please charge any additional fees or credit any overpayments as a result of the filing of this paper to our Deposit Account No. 02-3978.

The Examiner is invited to telephone the undersigned to discuss prompt resolution of any remaining issues necessary to place this case in condition for allowance.

Respectfully submitted,

**CHRIS E. JOHNSON et al.**

By 

Mark D. Chuey, Ph.D

Reg. No. 42,415

Agent for Applicant

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**BROOKS KUSHMAN P.C.**

1000 Town Center, 22nd Floor

Southfield, MI 48075-1238

Phone: 248-358-4400

Fax: 248-358-3351